

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF WYOMING

UNITED STATES OF AMERICA,

Plaintiff,

v.

JEREMY DANIEL WARD,
(Counts 1 and 2)

and

ROBIN LYNN LEHAT,
(Counts 1 and 2)

Defendants.

No.

Ct 1: 16 U.S.C. §§ 3372(a)(1) and
3373(d)(1)(B) and 21 U.S.C. § 2
(Lacey Act)

Ct 2: 18 U.S.C. §§ 641 and 2
(Theft of Government Property)

INDICTMENT

THE GRAND JURY CHARGES THAT:

COUNT ONE

From on or about April 20, 2022, through and including June 15, 2022, in the District of Wyoming, the Defendants, **JEREMY DANIEL WARD** and **ROBIN LYNN LEHAT**, did knowingly transport wildlife taken and possessed in violation of 36 C.F.R. 2.1(a)(1)(i), which wildlife had a market value of more than \$350.00, with the intent to sell said wildlife, and attempted to do so.

In violation of 16 U.S.C. §§ 3372(a)(1) and 3373(d)(1)(B) and 21 U.S.C. § 2.

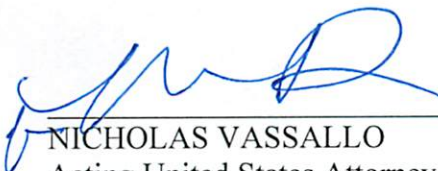
COUNT TWO

From on or about April 20, 2022, through on or about June 15, 2022, in the District of Wyoming, the Defendants, **JEREMY DANIEL WARD** and **ROBIN LYNN LEHAT**, did willfully and knowingly steal elk sheds and game skulls, property of the National Park Service, an agency of the United States, of a value exceeding \$1,000, and the Defendants knowingly aided and abetted each other in the commission of this offense.

In violation of 18 U.S.C. §§ 641 and 2.

A TRUE BILL:

Ink Signature on File with Clerk's Office
FOREPERSON


NICHOLAS VASSALLO
Acting United States Attorney

PENALTY SUMMARY

DEFENDANT NAME: JEREMY DANIEL WARD and
ROBIN LYNN LEHAT

DATE: July 19, 2022

INTERPRETER NEEDED: No

VICTIM(S): No

OFFENSE/PENALTIES: Ct: 1 16 U.S.C. §§ 3372(a)(1) and
3373(d)(1)(B) and 21 U.S.C. § 2
(Lacey Act)

0-1 Year Imprisonment
Up To \$100,000 Fine
1 Year Supervised Release
\$25.00 Special Assessment

Ct: 2 18 U.S.C. § 661 and 2
(Theft of Government Property)

0-10 Years Imprisonment
Up To \$250,000 Fine
3 Years Supervised Release
\$100 Special Assessment

TOTALS: 0-10 Years Imprisonment
Up To \$350,000 Fine
4 Years Supervised Release
\$125 Special Assessment

AGENT: Brett Timm, NPS

AUSA: Michael J. Elmore, Assistant United States Attorney

**ESTIMATED TIME OF
TRIAL:** 1 to 5 days

**WILL THE GOVERNMENT
SEEK DETENTION IN THIS
CASE:** Yes

**ARE THERE DETAINERS
FROM OTHER
JURISDICTIONS:** No